

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LYNX ASSOCIATES, INC.,

Plaintiff,

v.

ASG CONSULTANTS, LTD., et al.,

Defendants.

Civil Action No. 02-CV-2741

**KLEINBARD, BELL & BRECKER LLP'S MOTION
FOR LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANTS**

Kleinbard, Bell & Brecker LLP ("KBB") respectfully moves this Court, pursuant to Local Rule of Civil Procedure 5.1, for permission to withdraw as counsel for Defendants ASG Consultants, Ltd. ("ASG"), Amar Grewal and Kal Grewal. KBB makes this motion because Defendants have not satisfied their past financial obligations to KBB and it is unlikely that Defendants will be able to satisfy their ongoing financial obligations to KBB prior to the trial of this matter. Accordingly, for the reasons set forth in the memorandum of law being filed contemporaneously with this motion, KBB respectfully requests that it be permitted to withdraw as counsel for Defendants in this matter.

Respectfully submitted,

KLEINBARD, BELL & BRECKER LLP

Robert B. Bodzin
Eric J. Schreiner
1900 Market Street, Suite 700
Philadelphia, PA 19103
(215) 568-2000

Dated: January 15, 2004